

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

GILBERT MEDICAL BUILDING LLC,  
and AKY MD GILBERT, LLC,

Plaintiff,

v.

TRAVELERS CASUALTY INSURANCE  
COMPANY OF AMERICA,

Defendant.

Case No. 20-CV-896-R

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**JOINT MOTION FOR EXTENSION OF SCHEDULING ORDER DEADLINES**

COME NOW the parties, Gilbert Medical Building, LLC, AKY MD Gilbert, LLC, and Travelers Casualty Insurance Company of America, and jointly apply to the Court for a ninety (90) day extension of time for the remaining scheduling deadlines in this case. In support hereof, the parties would show the Court the following:

1. This is a joint application.
2. Two previous extensions of time have been sought by the parties.
3. The granting of this motion will impact the scheduled trial of this case.
4. The granting of this motion will result in new deadlines of the following:

<b>Deadline</b>	<b>Current Deadline</b>	<b>Requested Deadline</b>
Dispositive and <i>Daubert</i> motions	1/13/2022	4/13/2022
Discovery	2/1/2022	5/2/2022

<b>Deadline</b>	<b>Current Deadline</b>	<b>Requested Deadline</b>
Designations of deposition testimony to be used at trial to be filed by:	2/17/2022	5/18/2022
Objections and counter-designations to be filed by:	2/24/2022	5/25/2022
Motions in Limine (objections to be filed within 5 days)	2/28/2022	5/30/2022
Requested Voir Dire (objections to be filed within 5 days)	2/28/2022	5/30/2022
Requested Jury Instructions (objections to be filed within 5 days)	2/28/2022	5/30/2022
Final Pretrial Report	2/28/2022	5/30/2022
<b>PRE-TRIAL CONFERENCE</b>		to be set by Court
<b>TRIAL</b>	<b>March 08, 2022 at 9:00 a.m.</b>	to be set by Court

5. This motion is not made for purposes of delay, but rather because the parties are currently engaged in discovery with multiple depositions scheduled or in the process of being scheduled. The extension of the existing deadlines is sought to allow the parties an opportunity to complete necessary discovery for additional evaluation of this case and due to the difficulty of scheduling depositions during the holiday season and COVID-19 pandemic.

6. The parties have agreed to a private mediation with the anticipated mediation taking place in February 2022. The granting of this motion will facilitate a greater likelihood of success in the mediation.

WHEREFORE, premises considered, the parties respectfully request the instant Joint Motion for Extension of Scheduling Order Deadlines be granted.

Respectfully submitted,

**TAYLOR, FOSTER, MALLETT, DOWNS,  
RAMSEY & RUSSELL**

s/Jacob R. Daniel

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